

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS, DALLAS DIVISION**

SHANNON DAVES, *et al.*,

On behalf of themselves and all
others similarly situated,

FAITH IN TEXAS,
TEXAS ORGANIZING PROJECT,

On behalf of themselves,

Plaintiffs,

v.

DALLAS COUNTY, TEXAS, *et al.*,

Defendants.

Case No. 3:18-cv-154

JOINT NOTICE REGARDING MOTION TO COMPEL

On November 4, 2020, the Court granted in part Plaintiffs' motion to compel, including requiring the Dallas County Defendants to produce 100 hours of bail-hearing videos per year dating back to January 21, 2017. Dkt. 250. The Court ordered the "parties to confer and present a proposed method of random sampling to produce" the videos *Id.* at 8. On November 16, 2020, counsel for Dallas County and counsel for the Plaintiffs conferred by phone, and the County agreed to produce all of the videos of bail hearings in their possession from January 21, 2017 through December 2018. At the time of the conference, the County had not yet ascertained the number of hours of video that are available or the date range they cover. Plaintiffs accepted the offer to produce all available videos. The County confirmed that it would produce the videos within 60 days of the Court's November 4 Order.

Dated: November 18, 2020

Respectfully Submitted,

/s/ Elizabeth Rossi

Elizabeth Rossi (*Pro Hac Vice*)
D.C. Bar No. 1500502
Alec Karakatsanis (*Pro Hac Vice*)
D.C. Bar No. 999294
Katherine Hubbard (*Pro Hac Vice*)
D.C. Bar No. 1500503
Civil Rights Corps
1601 Connecticut Ave NW, Suite 800
Washington, DC 20009
Telephone: (202) 894-6142
elizabeth@civilrightscorps.org
alec@civilrightscorps.org
katherine@civilrightscorps.org

/s/ Andre Segura

Andre Segura
Texas Bar No. 24107112
Brian Klosterboer
Texas Bar No. 24107833
American Civil Liberties Union Fdn. of Texas
1500 McGowen Street, Suite 250
Houston, Texas 77004
Tel: 713.942.8146
asegura@aclutx.org
bklsterboer@aclutx.org

Attorneys for Plaintiffs

/s/ Brandon J. Buskey

Brandon J. Buskey
Andrea Woods
American Civil Liberties Union
Foundation
Criminal Law Reform Project
125 Broad Street, 18th Floor
New York, NY 10004
Tel: (212) 284-7364
bbuskey@aclu.org

/s/ Emily Gerrick

Emily Gerrick
Texas Bar No. 24092417
Texas Fair Defense Project
314 E. Highland Mall Blvd., Suite 108
Austin, Texas 78752
Telephone: (512) 637-5220
egerrick@fairdefense.org

/s/ Barry Barnett

Barry Barnett
State Bar No. 01778700
Susman Godfrey L.L.P.
8115 Preston Road, Suite 575
Dallas, Texas 75225
Telephone: 866-754-1900
Facsimile: 713-653-6666
bbarnett@susmangodfrey.com

Respectfully Submitted,

HUSCH BLACKWELL LLP

/s/ Katharine D. David

Katharine D. David
Texas Bar No. 24045749
kate.david@huschblackwell.com
Ben Stephens
Texas Bar No. 24098472
ben.stephens@huschblackwell.com
600 Travis, Suite 2350

Houston, Texas 77002
Tel: 713.525.6200
Fax: 713.647.6884

**COUNSEL FOR DALLAS COUNTY
DEFENDANTS**

CERTIFICATE OF SERVICE

I hereby certify that on November 18, 2020, I electronically filed the foregoing with the clerk of the court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the Court. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ Elizabeth Rossi
Elizabeth Rossi